

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

CHRISTOPHER SIMPSON, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

MINERAL FUSION NATURAL BRANDS, LLC,

Defendant.

Case No.: 1:24-cv-2332-RDB

CONSENT MOTION TO EXTEND TIME FOR DEFENDANT
TO RESPOND TO COMPLAINT

In accordance with Fed.R.Civ.P. 6(b)(1) and Local Rule 105(9), Plaintiff Christopher Simpson, on behalf of himself and all others similarly situated (“Plaintiff”), by and through undersigned counsel, moves the Court for an order extending the time for Defendant Mineral Fusion Natural Brands, LLC (“Defendant” and, together with Plaintiff, the “Parties”) to respond to Plaintiff’s complaint (Dkt. No. 1).

In support, Plaintiff states as follows:

1. Plaintiff filed his Class Action Complaint on August 12, 2024. (Dkt. No. 1).
2. Defendant’s response to Plaintiff’s Complaint was due on September 4, 2024.
3. Plaintiff has conferred with Defendant’s counsel and Defendant only retained counsel in this matter earlier this week and needs additional time to engage local counsel to assist in defense of the matter. The Parties also discussed early resolution and plan to continue to work in good faith to resolve the matter and, failing that, narrow the issues in this case.
4. Defendant’s counsel has requested and Plaintiff has agreed to a 30-day extension of Defendant’s responsive pleading deadline to allow the Parties additional time to discuss resolution and, failing that, allow sufficient time to enable Defendant to formally engage local counsel and prepare its response to the Complaint.
5. This is the first request for any extension of time to respond to the Complaint.
6. For these reasons, the Parties respectfully request that this Court enter the attached proposed order granting the motion to extend Defendant’s responsive pleading deadline by 30-days (to October 4, 2024) and grant such other and further relief as the Court deems necessary.

Dated: September 5, 2024

Respectfully submitted,

/s/ Steffan T. Keeton
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of September, 2024, a true and correct copy of the foregoing Statement of recent relevant decision was served via ECF E-File on all parties/attorneys of record in this matter.

/s/ Steffan T. Keeton
Steffan T. Keeton